

Patrick J. Neligan, Jr.  
State Bar. No. 14866000  
Douglas J. Buncher  
State Bar No. 03342700  
John D. Gaither  
State Bar No. 24055516  
NELIGAN LLP  
325 North St. Paul, Suite 3600  
Dallas, Texas 75201  
Telephone: 214-840-5333  
Facsimile: 214-840-5301  
[pneligan@neliganlaw.com](mailto:pneligan@neliganlaw.com)  
[dbuncher@neliganlaw.com](mailto:dbuncher@neliganlaw.com)  
[jgaither@neliganlaw.com](mailto:jgaither@neliganlaw.com)

**PROPOSED COUNSEL FOR DEBTORS**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>IN RE:</b>	<b>§</b>	<b>CHAPTER 11</b>
<b>NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,</b>	<b>§</b>	<b>CASE NO. 21-30085-___</b>
<b>DEBTORS<sup>1</sup></b>	<b>§</b>	<b>Joint Administration Requested</b>

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**NOTICE OF FILING REVISED PROPOSED ORDERS**

**PLEASE TAKE NOTICE** of the revised proposed Orders, redlined versions of which are attached hereto as Exhibits, are submitted in connection with the following First Day Motions:

1. **Exhibit A** - Debtors' Emergency Motion for An Order Directing the Joint Administration of Chapter 11 Cases [Docket No. 2];
2. **Exhibit B** - Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Existing Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms [Docket No. 5];
3. **Exhibit C** - Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief [Docket No. 6]; and

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<sup>1</sup> The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

4. **Exhibit D** - Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes [Docket No. 7].

Dated: January 20, 2021

Respectfully submitted,

*/s/ Patrick J. Neligan, Jr.* \_\_\_\_\_

Patrick J. Neligan, Jr.

Texas Bar No. 14866000

[pneligan@neliganlaw.com](mailto:pneligan@neliganlaw.com)

Douglas J. Buncher

Texas State Bar No. 03342700

John D. Gaither

Texas Bar No. 24055516

[jgaither@neliganlaw.com](mailto:jgaither@neliganlaw.com)

**NELIGAN LLP**

325 N. St. Paul, Suite 3600

Dallas, Texas 75201

Telephone: (214) 840-5300

Facsimile: (214) 840-5301

**PROPOSED FOR THE DEBTOR**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 20<sup>th</sup> day of January 2021 a true and correct copy of the foregoing was served on all parties receiving notice via this Court's CM/ECF notification system.

*/s/ John D. Gaither* \_\_\_\_\_

John D. Gaither